

# Morgan Lewis

**Regina Schaffer-Goldman**

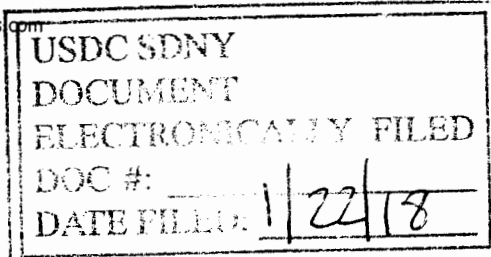
Associate

+1.212.309.6689

regina.schaffer-goldman@morganlewis.com

January 19, 2018

**VIA ECF**



The Honorable Robert W. Sweet  
United States District Judge  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: *Castro v. Saks Fifth Avenue LLC*, No. 1:17-cv-09028 (RWS)  
Request to Extend Defendant's Time to Answer, Move or Otherwise Respond to the  
Complaint

Dear Judge Sweet:

This firm represents Defendant Saks Fifth Avenue LLC ("Saks") in the above-referenced action. Pursuant to Rule 1.E. of Your Honor's Individual Practices, we write with the consent of Plaintiff's counsel to respectfully request that the Court extend Saks's time to answer, move, or otherwise respond to the Complaint, from the current due date of January 3, 2018 to February 19, 2018.

In support of this request, Saks states that its counsel has just been engaged and will need additional time to become familiar with the relevant facts of this case. Saks makes this request after the original Answer was due because although the Summons and Complaint were served on the New York Secretary of State, it appears that the New York Secretary of State never forwarded those documents to Saks.

Pursuant to Section 1.E of this Court's Individual Practices, (1) the original due date for Saks to respond to Plaintiff's Complaint was January 3, 2018; (2) there have been no previous requests for an adjournment or extension of time; (3) whether previous requests were granted or denied is not applicable here; and (4) Plaintiff has courteously consented to this request.

Thank you for your consideration of this request.

*S. ordered  
Brock USDC  
1-22-18*

**Morgan, Lewis & Bockius LLP**

101 Park Avenue  
New York, NY 10178-0060  
United States

📞 +1.212.309.6000  
📠 +1.212.309.6001

The Honorable Robert W. Sweet  
January 19, 2018  
Page 2

Respectfully submitted,

*/s/ Regina Schaffer-Goldman*

Regina Schaffer-Goldman

c: Counsel of Record (via ECF)